## BILL OF COMPLAINT, No. 10869 Equity.

The Frederick-Town Savings Institution, a body Corporate of the State of Maryland.

Vs.

Ross C. Praed, widow, James E. R. Beard, infant, and Kyle M. Beard, infant.

No. 10869 E Q U I T Y.
In the Circuit Court
for Frederick County,
Maryland, sitting as a

Court of Equity.

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To the Honorable, the Judges of the Circuit Court for Frederick County, Maryland sitting as a Court of Equity;-

Your Orator, which sues as well for itself as for all other creditors of James 1.C. Beard, late of Frederick City, in Frederick County, State of Maryland, deceased, who will come in and contribute to the expenses of this suit.complainting.says;-

- 1. That the said James I.C. Beard was, in his lifetime, indebted unto your Owator, The Frederick-Town Savings Institution, a body corporate of the State of Maryland, in the full and just sum of twenty-seven hundred (\$2700.00) dollars, upon his promissory note dated April 1st, 1922, payable six months after date to The Frederick Town Savings Institution, or order, and upon which note Rosa C. Beard, his wife, the above named Defendant, and D. F. Wachter, were and are the joint makers or sureties thereon, and upon which the interest has been paid to the daye December 1st, 1923, as will appear by reference to said promissory note filed herewith as a part hereof, and marked "Exhibit A".
- 2. And, that the said James 1.C. Beard was, in his lifetime, also indebted unto your Orators, The Frederick Town Savings Institution, in the full and just sum of eight hundred (\$800.00) dollars, upon his promissory note dated April 14th, 1922, payable six months after date to The Frederick Town Savings Institution, or order, in the original amount \$1800.00, upon which note \$1000.00 was paid on the principal thereof on the date October 11th, 1922, and on which note Rosa C. Beard, his wife, the above named Defendant, was and is the joint maker or surety, and on which the interest was paid to the date December 1st, 1923, all of which will more furly and at large appear by reference to said promissory note, filed herewith as a part hereof and marked "Exhibit B".
- That the said James I.C.Beard being so indebted as aforesaid unto your Orator, and also possibly unto other persons, departed this life on or about the date october 15th, in the year 1922, intestate, and leaving surviving him a widow, the Defendant, Rosa C.Beard, who is now said to be about 46 years of age, and two infant children, the Defendants, James E.R.Beard, who was born about the date August 14th, 1908, and Kyle M.Beard, who was born about the date March 4th, in the year 1913, and which widow and children of the said James L.C.Beard now reside in Frederick County, in the State of Maryland.
- 4. That there has been no administration upon any personal estate of the said James L.C. Beard in the Orphans Court for Frederick County, Maryland, and your Orator is informed and so charges and believes that the said James L.C. Beard was possessed of no personal property or estate at the time of his death out of which payment of the sums of money due your Orator, in whole or in part, or until any other creditors, if any, of the said James L.C. Beard could be made.
- 5. That at the time of his death, the said James L.C. Beard was seized and possessed of a certain lot of real estate situated, lying and being on the North side of East Church Street, extended, in Frederick City, in Frederick County, Maryland, the same being a lot of ground improved with a dwelling house, and which dwelling house is now occupied by the Defendant, the widow and children of said James L.C. Beard; and said real estate being the same as described in the Deed from Clara Lowenstein, widow, to James L.C. Beard, dated April 12th, in the year 1920, and being part of lot no.63 as laid out and